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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Carrie Ferrara Clark,  
Plaintiff,  
v.  
City of Tucson,  
Defendant.

CV-14-02543-TUC-CKJ

**JURY QUESTIONS  
DURING TRIAL**

Jury questions during trial.

Day 8

April 10, 2019

We were told before, turn out  
are inspected at beginning of month  
~~if~~ if Camie had issue w/ turn out  
on 8/29. why couldn't they have  
waited a few days until beginning  
of June for the regular check?

On your hand written note of  
phone call 03/20/13 what are  
SL, VL, PL? (middle of page)  
with numbers

Why did you ask Camie if she  
could freeze her milk? What would  
have come of it? (in ref. to address the  
issues we're discussing?)

(41)

Testified

: "Trusted Staffers" to place Carrie in appropriate work stations. Did you send email to the staffers regarding these needs as to what was appropriate for her? If not, how did staffers know stations that were appropriate for Carrie Clark?

(42)

your notes from 3/21/13 states  
"Julie discussed Affordable Care Act  
with Carrie, told her "its reasonable."

- when did Julie speak with Carrie?
- what is "reasonable" in reference to?
- who is "Julie"?

(43)

If Carrie Clark was stationed at Fire Department B not under you, why do you have a Supervisor file on Carrie Clark? (Station 12, 20416) rather than her supervisor Paul McDonough?

44

Captain may decide to "run short"?

~~Engine~~ not fully staffed? Not

necessarily out of service?

45

"On a call" - means truck is out  
of service?

Do you know (u/c)  
How often Carrie requested  
changes to her schedule?

(47)

During verbal ~~con~~ consulting (SP)  
was Carrie ask if she had  
hang-up - i.e. give opportunity  
to accept or reject

(10/18)  
If Carme (pregnant) had a  
concern of her turn-outs  
not buttoning, don't you  
think she would have brought  
it to someone's attention?

Why would anyone want  
faulty PPE?

Did the clarification cause changes in the seniority rank "list"?

If so, why? If this was just a clarification, why would the list need to be changed?

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On 3/13/2016 memo

"This list reflects ~~statting~~ changes that will be effective by May 29, 2016" Please explain this.

50

seniority memo

Why make effective retroactively?

Arbitrary? Any reason?

51

If you "encouraged her" to go back into the field (as you testified) did you also inform her that would change her seniority ranking? Since that policy was going live?

52

Record May 13<sup>th</sup> Document

If there was no change in  
seniority ~~to~~ policy - how could it  
have affected Carrie, since  
there was no change?

What part affected her?

53

Day of the week - May 1 2016.

Given the seeming opposing testimony regard that the post-date of the seniority 'policy' did and did not <sup>have</sup> affect on Carries seniority could the jury see seniority lists that demonstrate either or both claims?

54

Both examples on the  
seniority document seem  
to indicate that seniority  
is not affected by a break in  
classification - however the  
language seems to indicate  
that seniority is affected by  
a break in classification.  
Which is it?

Note: both examples indicate  
that seniority starts with  
the early date of classification.

Am I reading this incorrectly?

Garcia's testimony indicated  
that this not the case. The  
break interrupts seniority.

56

We were shown a seniority list  
in which Carine dropped approx.  
14 spots AFTER this memo  
was issued. Why?

57

Is there a Kaven Baker? Or  
did I mishear and you're  
the only female Baker?

was change in vacation time due to  
exercise?

458

Did you understand remedy 59  
calculations pre and post policy?  
Did they change?

53

How did the master memo affect Carre? i.e. what was the mechanism?

Is it possible that Carre's had seniority had been calculated in error previously i.e. not excluding her time not as PM but as another classification?

Why was Garcia so sure that Carre was not affected when you were presenting that she was?